

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal No: 1:20-cr-10012-IT |
| |) | |
| PAUL BATEMAN, |) | |
| |) | |
| Defendant. |) | |

JOINT MOTION TO SEAL EXHIBIT CONTAINING VICTIM INFORMATION

Now come the parties and respectfully request leave to file Exhibit A to the parties' joint request for restitution (D.E. 169) under seal. As reasons therefor, the parties submit that, in light of the sensitive nature of the subject matter and the inclusion of victims' names relative to restitution requests and awards, Exhibit A should be sealed pursuant to 18 U.S.C. § 3509(d)(2). Finally, where the joint restitution request fully addresses the overall amount of restitution and the reasons therefore, the balance of interests justifies withholding Exhibit A from public disclosure. *United States v. Kravetz*, 706 F.3d 47, 62-63 (1st Cir. 2013).

Respectfully Submitted,

PAUL BATEMAN,
By his attorney,

/s/ Sandra Gant
Sandra Gant
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic filing.

Dated: July 22, 2024

/s/ Sandra Gant
Sandra Gant